

Message

From: Hewitson - CDPHE, Ingrid [ingrid.hewitson@state.co.us]
Sent: 3/29/2017 5:49:20 PM
To: Palma, Elizabeth [Palma.Elizabeth@epa.gov]
CC: Payton, Richard [Payton.Richard@epa.gov]
Subject: Re: Exceptional Events Mitigation

Hi Beth,

Thank you for your feedback, I will make the suggested changes and work on getting everything else updated and cleaned up. I am glad you will be putting the crosswalk on your website, I think it will be helpful to other states. If I have further questions I will reach out to Richard.

Thanks for all your help!

Ingrid Hewitson, MPH

Air Quality Planner
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On Wed, Mar 29, 2017 at 9:10 AM, Palma, Elizabeth <Palma.Elizabeth@epa.gov> wrote:

Hi, Ingrid –

Again, thanks for sharing your draft plan. I've taken a quick look and like the way you have organized the plan – as you note in your previous email, you clearly identify the applicable rule element and then discuss how you are addressing this element. This approach will help EPA review the plan that you ultimately submit. Also as you note, you have cut-and-pasted content from your NEAP, SIP, etc and this info still needs updating (I noticed some of the dates have passed). You may want to pay particular attention to updates to the NRCS CRP elements to include general evidence/discussion of penetration, scale and intensity (i.e., where and how applied, involved acres, etc)...I realize this is voluntary. (You may be able to make some general statements in your mitigation plan and/or include some of the detail that you have included in past demos as well as continue to address specifics in future EE high wind dust/PM10 demos.)

A couple of specific comments:

- Pg 16 – “Since the Division had submitted more than three demonstrations for Lamar under the provisions of 40 CFR 50.14 in a 3-year period, Prowers County was included in Table 6 of the **Federal Register** preamble to the final rule.”
- Pg 17 – “The Division has robust processes in place to collect and maintain data pertinent to the event.” Can you add a couple of sentences indicating what you have done? (this may be part of your update process.)

- Pg 18 - Further, the Division will re-evaluate whether this plan needs to be revised on an as needed basis and during any SIP renewal processes. If the plan is updated or modified, interested stakeholders will be notified and may provide comment during a 30 day public comment period. Any SIP renewal or any PM10/PM SIP renewal? "If the plan is updated or modified" – any modifications or modifications to notification, education and outreach and/or control measures? "will be notified" – how? (if the same as discussed elsewhere in plan, you may want to note this.)
- Pg 18 - EPA notified the Division the Prowers County was subject to 51.930(b) on September 30, 2016, therefore this mitigation plan was due to EPA no later than September 30, 2018.

Thanks again for the opportunity to take a look at your draft plan. If you have specific questions, I'm sure Richard Payton in Region 8 can assist. As an aside, as a result of your feedback, we plan to post the crosswalk on our website....we just have to go thru the approval process (hopefully soon). Thanks for the feedback!

Beth

Beth W. Palma

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From: Hewitson - CDPHE, Ingrid [mailto:ingrid.hewitson@state.co.us]

Sent: Monday, March 27, 2017 2:45 PM

To: Palma, Elizabeth <Palma.Elizabeth@epa.gov>

Subject: Re: Exceptional Events Mitigation

Hi Beth,

I just wanted to touch base and see if you had had a chance to glance at my draft plan. I would like to finish it up in the next month or two so if I am on the wrong track it would be great to know sooner rather than later. Any feedback would be greatly appreciated (on approach more than specific content).

Thanks,

Ingrid Hewitson, MPH

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On Thu, Mar 9, 2017 at 9:45 AM, Hewitson - CDPHE, Ingrid <ingrid.hewitson@state.co.us> wrote:

Hi Beth,

I have just started working on it and the crosswalk has been very helpful. I have attached my rough draft for you to see if you are interested - disregard all the colors. I just copied and pasted many of the elements from our NEAP into it and still need to clean it up but you should be able to see what I am going for. I used the crosswalk to identify required sections and then tried to address each crosswalk item separately. Hopefully with this layout you all will be able to go through it easily and see all the required parts are present by comparing it to the crosswalk.

If I am on the wrong track please let me know but in general I felt the crosswalk was nice because it clearly laid out the items that you will be reviewing and looking for in a mitigation plan without me having to sift through the reg. I would definitely recommend putting it on the website because I think it also provides transparency for what exactly will be reviewed and required. Let me know if you have any other questions and any feedback you all have (whether I am on the right track) would be much appreciated.

Thanks,

Ingrid Hewitson, MPH

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On Wed, Mar 8, 2017 at 11:43 AM, Palma, Elizabeth <Palma.Elizabeth@epa.gov> wrote:

Hi, Ingrid –

I wanted to check in to see whether you have had a chance to work on your mitigation plan and whether the crosswalk that I forwarded last month was helpful. I'm asking because we are gearing up to post additional links/info to the Exceptional Events Website and we considered posting the previously forwarded mitigation info. While we are using the doc internally, we thought it might be useful to post as an example for air agencies, too. We would appreciate any feedback that you can provide. Thanks in advance.

Beth

Beth W. Palma

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From: Hewitson - CDPHE, Ingrid [mailto:ingrid.hewitson@state.co.us]
Sent: Thursday, February 09, 2017 12:52 PM
To: Palma, Elizabeth <Palma.Elizabeth@epa.gov>
Cc: Payton, Richard <Payton.Richard@epa.gov>; CHANG, RANDALL <Chang.Randall@epa.gov>
Subject: Re: Exceptional Events Mitigation

Thank you very much for sharing this Beth and I will be in touch down the road.

Thanks,

Ingrid Hewitson, MPH

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On Thu, Feb 9, 2017 at 10:42 AM, Palma, Elizabeth <Palma.Elizabeth@epa.gov> wrote:

Ingrid –

As we discussed yesterday, I am forwarding an example (draft) crosswalk that we recently received from HI. HI is subject to the subpart H emergency episode planning requirements under 40 CFR 51.152 as well as to the new exceptional events mitigation requirements under 40 CFR 51.930. Because many of the mitigation/contingency planning elements in these 2 programs are the same, HI is developing a single plan that meets the regulatory requirements of both programs. The plan introduction indicates that the area is subject to both plans and then points to the crosswalk in the appendix. You may be able to take the same approach with your 40 CFR 51.930 mitigation plans and NEAPs, either by augmenting an existing NEAP or by cutting and pasting NEAP components into a (new) mitigation plan. Also as we discussed, I have attached a checklist that we developed to guide our internal review of mitigation plans. This checklist provides more detail on the 51.930 regulatory requirements – feel free to use (or not).

Please let me (or Richard Payton) know if you have any additional questions. Also, if you decide to develop a 51.930/NEAP crosswalk or consolidated plan, we would be interested in seeing (and sharing) that potentially in advance of receiving a final plan.

Beth

Beth W. Palma

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